IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS

IN RE: DEALER MANAGEMENT SYSTEMS ANTITRUST LITIGATION

MDL No. 2817 Case No. 18 C 864

This Document Relates to All Cases

MOTION FOR APPOINTMENT OF THE MILBERG TADLER GROUP TO LEAD THE DEALERSHIP CLASS ACTION

Pursuant to Federal Rule of Civil Procedure 23(g), Plaintiffs Teterboro Automall, Inc., JCF Autos LLC, 440 Jericho Turnpike Sales LLC, Patchogue 112 Motors LLC, Kenny Thomas Enterprises, Inc. (d/b/a Olathe Toyota), and Waconia Dodge, Inc. ("Moving Plaintiffs") respectfully move this Court for the appointment of (1) Peggy J. Wedgworth of Milberg Tadler Phillips Grossman LLP ("Milberg Tadler") as Interim Lead Class Counsel; (2) Leonard A. Bellavia of Bellavia Blatt, PC; Daniel C. Hedlund and Michelle J. Looby of Gustafson Gluek PLLC; and Michael Schrag and Amy Zeman of Gibbs Law Group LLP as members of a Plaintiffs' Steering Committee; and (3) Kenneth A. Wexler of Wexler Wallace LLP as Liaison Counsel (collectively, the "Milberg Tadler Group"). In support of this Motion, Moving Plaintiffs submit herewith a Memorandum of Law

and the Declarations of Peggy J. Wedgworth, Esq., and Leonard A. Bellavia, Esq., (including exhibits).

Dated: March 26, 2018

Respectfully submitted,

/s/ Peggy J. Wedgworth
Peggy J. Wedgworth*

Andrei Rado

Elizabeth A. McKenna

Charles Slidders

MILBERG TADLER PHILLIPS GROSSMAN LLP

One Pennsylvania Plaza, 19th Floor New York, NY 10119 (212) 594-5300 pwedgworth@milberg.com emckenna@milberg.com *Admitted pro hac vice

Leonard A. Bellavia*

BELLAVIA BLATT, P.C.

200 Old Country Road, Suite 400 Mineola, NY 11501 (516) 873-3000 lbellavia@dealerlaw.com *Admitted pro hac vice

Counsel for Plaintiffs Teterboro Automall, Inc., JCF Autos LLC, 440 Jericho Turnpike Sales LLC, and Patchogue 112 Motors LLC

Eric H. Gibbs**
Michael L. Schrag**
Amy M. Zeman**

GIBBS LAW GROUP LLP

505 14th Street, Suite 1110
Oakland, CA 94612
(510) 350-9700
ehg@classlawgroup.com
mls@classlawgroup.com
amz@classlawgroup.com
**Pro hac vice application pending
Counsel for Plaintiff Kenny Thomas Enterprises,
Inc. (d/b/a Olathe Toyota)

Daniel E. Gustafson Daniel C. Hedlund* David A. Goodwin Michelle J. Looby* Daniel J. Nordin

GUSTAFSON GLUEK PLLC

Canadian Pacific Plaza
120 South Sixth Street, Suite 2600
Minneapolis, MN 55402
(612) 333-8844
dgustafson@gustafsongluek.com
dhedlund@gustafsongluek.com
dgoodwin@gustafsongluek.com
mlooby@gustafsongluek.com
dnordin@gustafsongluek.com
*Admitted pro hac vice

Kenneth A. Wexler
Bethany R. Turke
Thomas A. Doyle
Justin N. Boley
WEXLER WALLACE LLP
55 W. Monroe Street, Suite 3300
Chicago, IL 60603
(312) 346-2222
kaw@wexlerwallace.com
brt@wexlerwallace.com

tad@wexlerwallace.com jnb@wexlerwallace.com

Counsel for Plaintiff Waconia Dodge, Inc.